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ORIGINAL

FILED

JUN 21 2011

TAWANA C. MARSHALL, CLERK
U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:

GEORGE D. RINGER AND
MARY C. RINGER,
Debtors. § § CASE NO. 10-38013
§ § (CHAPTER 7)
§

SOLAR SOCCER CLUB, § §
Plaintiff, § §
v. § § ADV. NO. 11-03072
§ §
GEORGE D. RINGER, § §
Defendant. § §

DEFENDANT'S EXHIBIT LIST

Under section III (3) of the Court's February 4, 2011 Scheduling Order, Defendant

George D. Ringer, files his Exhibit List:

Ex 1. DEFT 1-39 Arch Insurance correspondence and policy

Ex 2. DEFT 40-143 Solar Soccer Club Articles of Incorporation;
Correspondence exchanged between Steven Badger
and David Ringer

Ex 3. DEFT 144-158 Documents exchanged with Mark Scholten

Ex 4. DEFT 159-194 Promissory Notes, Guaranty Agreement, Pledge and Security Agreement, Profit and Loss Statements

Ex 5. DEFT 220-740 Club Administration Payments June 2003 through January 2010

Ex 6. DEFT 741-822 Solar Soccer Club QuickAccount Reports for 2003-2010

Ex 7. DEFT 823-875 Financial and other materials relating to last site Contract

Ex 8. DEFT 876-908 Promissory Note and Loan Interest records for 2005-2010; MDGMA Promissory Note and payment spreadsheet, Scholten Promissory Note, Ward Management Trust Promissory Note

Ex 9. DEFT 909-957 G. David Ringer, P.C. billing records

Ex 10. DEFT 958-1123 Various emails

Ex 11. Solar Soccer Club's financial records, including financial statements, tax returns, Form 990s, records of notes and other borrowings, records related to the repayment of debt, records related to services provided to the Club and payments for those services, records of payments to insiders, members, officers, directors, and affiliates; Solar Soccer Club's general ledger or QuickBooks accounts and records

Ex 12. Correspondence, including letters, faxes, emails, and other forms of communication among and between Ringer, Scholten, Hazard, and other directors, members, professionals, service providers, banks and other creditors, about the Club's operations, executive decisions, budgets, cash requirements, sources of revenue, debt, uses of cash, expenses, taxes, payments, dues, searches for property and training facility, and litigation

Ex 13. Records, documents, and electronic or magnetic data about the subjects listed in no. 12

Ex 14. Records, communications, and electronic or magnetic data about either (a) communications about the Club's business, operations, finances, borrowings, and payments to its President Scholten, its Board of Directors, individual directors, or other officers and (b)

books, records, and data about these matters, which were available to President Scholten, the Board, individual directors, and other officers between 1996 and the present

Ex 15. Solar Soccer Club's communications with newspapers or other media and reporters regarding Ringer or the Club's allegations against Ringer

Ex 16. Records, documents, and electronic or magnetic data about the services, which D. David Ringer, P.C. or David Ringer, acting as a lawyer, provided to Solar Soccer Club, including services in connection with various pieces of litigation (e.g., a lawsuit involving the Prince of Peace and a lawsuit involving a Club coach) or searches or negotiations for actual or prospective business deals

Ex 17. Records, documents, and electronic or magnetic data about the executive services, which David Ringer provided to the Club

Ex 18. Records, documents, and electronic or magnetic data about all payments, which the Club made or allegedly made to David Ringer or G. David Ringer, P.C.

Ex 19. Records, documents, and electronic or magnetic data about all payments, which the Club made to Mark Scholten, Scholten's family, or trusts or other entities controlled by Scholten or his family, regardless of purpose (including compensation, reimbursement, or payment of debt)

Ex 20. Records, documents, and electronic or magnetic data about all payments, which the Club made to its officers, directors, members, and affiliates, or to trusts or other entities controlled by such persons or their families, regardless of purpose (including compensation, reimbursement, or payment of debt)

Ex 21. Records, documents, and electronic or magnetic data about the Club's growth, in terms of the revenues, numbers of teams sponsored, number of members and players, and other measures, between 1996 and the present

Ex 22. Solar tax records, which Solar produced to Ringer, on June 15, 2011 via email and bates labeled by Ringer, SOLAR00001-00192.

Defendant reserves the right to use any and all Responses and/or Answers to Written Discovery and any amendments and/or supplements thereto, served by any party in response to any party's Requests for Disclosures, Request for Production, Interrogatories, Request for Admissions, written and/or oral depositions.

Defendant may use any and all exhibits listed by, produced by and/or requested from Plaintiffs and/or any other party at the time of trial.

Defendant may use any and all exhibits listed by the Plaintiffs and not ultimately objected to by the Defendant.

Defendant may use any and all exhibits to all depositions taken in this matter, and not ultimately objected to by the Defendant.

Defendant may use any exhibits produced and/or referred to in the discovery responses of any party to this matter, and not ultimately objected to by the Defendant.

Defendant further reserves the right to introduce, should the need arise, any and all documents not specifically listed herein, but exchanged by the parties throughout the discovery process of this lawsuit.

Defendant also reserves the right to use other demonstrative aids that may be created between now and the time of trial, including blow-ups, enlargements and/or other public documents.

Defendant reserves the right to use any rebuttal evidence and/or call any rebuttal witnesses, if necessary.

Defendant reserves the right to amend/or supplement his Exhibit List, following stipulations by counsel and/or rulings by the Court.

Dated: June 21, 2011

Respectfully submitted,


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**ATTORNEYS FOR GEORGE
DAVID RINGER**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 21, 2011, a true and correct copy of the foregoing pleading was forwarded by first-class mail and fax to Steven J. Badger, Zelle, Hofmann, Voelbel & Mason, LLP, 901 Main Street, Suite 4000, Dallas, Texas 75202-3975, 214.72.3000, 214.760.8994 (fax) as well by first-class mail to the persons listed on the attached service list.


Christopher L. Barnes

Trustee: Robert Yaquinto Jr. 509 N. Montclair Dallas, Tx. 75208-5450	Debtor: Mary C. Ringer 9522 Moss Haven Dallas, Tx. 75231-2608	Debtor's Attorney Joyce W. Lindauer Joyce W. Lindauer, Attorney at Law 8140 Walnut Hill Lane, Suite 301 Dallas, Tx. 75231
Attorney General of Texas Bankruptcy Division PO Box 12548 Austin, Tx. 78711-2548	U.S. Bankruptcy Court 1100 Commerce St., Room 1254 Dallas, Tx. 75242-1305	Bobby D. Associates c/o Heather H. Jobe c/o Bell Nunnally & Martin, LLP 3232 McKinney Ave., Suite 1400 Dallas, Tx. 75204-2429
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Internal Revenue Service Centralized Insolvency Operations PO Box 7346 Philadelphia, PA 19101-7346	Internal Revenue Service Attn: Vickie Fortson 4050 Alpha Rd., Room 185 MC 5120 Dallas, Tx. 75244-9440	Internal Revenue Service Mail Code DAL-5020 1100 Commerce St. Dallas, Tx. 75242-1001
Round Point Mortgage PO Box 19409 Charlotte, NC 28219-9404	Internal Revenue Service PO Box 21126 Philadelphia, PA 19114	Richardson I.S.D. c/o Perdue, Brandon, Fielder, et al PO Box 13430 Arlington, Tx. 76094-0430
U.S. Trustees Office 1100 Commerce Street, Room 976 Dallas, Tx. 75242-0996 Discover Card PO Box 15192 Wilmington, DE 19850-5192	U.S. Trustee 1100 Commerce St., Room 976 Dallas, Tx. 75242-1011	US Attorney Main & Justice Bldg. 10 th & Pennsylvania NW Washington, DC 20530-0001
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